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July 8, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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JUL - 8 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Attention: Policy and Rules Division
Stop Code 1800D

Re: MM Docket Nos. 91-221, 87-8, 94-150 and 87-154
Television Station KAME(TV), Reno, Nevada

Dear Mr. Caton:

On behalf of KTVU Partnership ("KTVU"), and in connection with the above-referenced proceedings, we submit herewith KTVU's response to the FCC's June 17, 1997 Public Notice requesting information on television local marketing agreements.

KTVU currently provides programming to Television Station KAME(TV), Channel 21, Reno, Nevada pursuant to a Time Brokerage Agreement dated as of August 31, 1995 ("TBA") with Broadcast Development Corporation, the licensee of KAME(TV). KTVU is the 100% stockholder of Nevada Television Corporation, licensee of Television Station KRXI(TV), Channel 11, in Reno, Nevada. Both stations are located in the Reno, Nevada Designated Market Area ("DMA") which is ranked 119th in the country. There is 100% overlap of KAME(TV)'s and KRXI(TV)'s city grade, Grade A and Grade B contours. KRXI(TV) had a share of 7 for each of the November 1996, February 1997 and May 1997 ratings periods. KAME(TV) had a share of 4 for November 1996, 3 for February 1997 and 3 for May 1997.

Under the TBA, KTVU provides programming to KAME(TV), a UPN affiliate, for 100% of the station's broadcast week subject to the licensee's preemption rights and right to broadcast additional programming that the licensee deems appropriate to respond to ascertained issues of concern to Reno. The initial term of the TBA commenced on August 31, 1995 and expires on August 31, 2000. The TBA may be renewed at the option of either party for an additional five-year term.

To provide some background on the relationship between KRXI(TV) and KAME(TV), KRXI(TV) is a new VHF station which commenced operations in December 1995. At

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approximately the same time that KTVU commenced its time brokerage arrangement with KAME(TV), it entered into a Management Services Agreement with Nevada Television Corporation ("NTC"), a minority-controlled company, pursuant to which KTVU agreed to assist NTC in constructing the station and in programming the station upon construction. NTC had obtained the construction permit through a comparative hearing in 1991 but had not yet completed construction in 1995 when it entered into the Management Services Agreement with KTVU. KTVU provided technical and operational assistance in the construction of KRXI(TV) over the next several months and assisted KRXI(TV) in affiliating with the FOX network. KTVU's assistance to KRXI was crucial to ensuring that the station commenced operations promptly with a strong programming format. Due in part to KTVU's efforts, the relatively small Reno market now enjoys a new VHF signal that not only provides superior coverage of Reno but also provides service to certain gray areas in the market. In December 1996, KTVU exercised its option to purchase the stock of NTC and closed on this acquisition in June 1997.

KTVU's time brokerage arrangement with KAME(TV) has had equally important public interest benefits. Prior to the TBA, KAME(TV) aired minimal public affairs programming, had limited involvement with the local community and did not carry any news programming. Under the TBA, however, KAME(TV) has enhanced its efforts in all three areas. The station airs an ongoing public service campaign "Me and the Community" which consists of a series of PSAs covering topics such as health care, the dangers of drug use, fire safety, the Humane Society, and local Boy and Girl Scouts troops and activities. KAME(TV) and KRXI(TV) have also participated in over 50 charitable events including "Pops By the River," events sponsored by the University of Nevada, Humane Society events, the Muscular Dystrophy Telethon, the Nevada Opera and events sponsored by the Auto Museum. KAME(TV) also now rebroadcasts the hour-long daily newscast produced by KTVU and aired on Television Station KTVU(TV) in Oakland, California. This newscast covers issues of regional and national concern that are of importance to the Reno, Nevada area. KAME(TV) and KRXI(TV) are now working together to investigate the prospects of initiating a locally-produced newscast, a project neither station could undertake on its own absent the TBA.

In summary, KTVU's time brokerage arrangements with KAME(TV) and KRXI(TV) have produced substantial public interest benefits the most significant of which are increased programming diversity and public service to the Reno community.

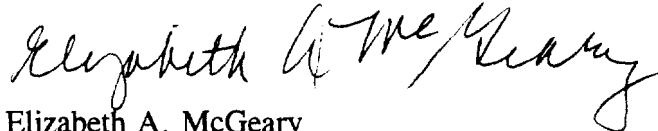
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Should any questions arise concerning this submission, kindly contact the undersigned.

Very truly yours,

A handwritten signature in cursive script, reading "Elizabeth A. McGeary". The signature is written in dark ink and is positioned above the printed name.

Elizabeth A. McGeary

cc: Joseph Godles, Esq.